

# ***EXHIBIT 17***

***UNREDACTED VERSION  
OF DOCUMENT SOUGHT  
TO BE SEALED***

# ***EXHIBIT 17***

Neel Chatterjee (SBN 173985)  
*nchatterjee@goodwinlaw.com*

James Lin (SBN 310440)  
*jlin@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
135 Commonwealth Drive  
Menlo Park, California 94025  
Tel.: +1 650 752 3100  
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)  
*bschuman@goodwinlaw.com*

Shane Brun (SBN 179079)  
*sbrun@goodwinlaw.com*

Rachel M. Walsh (SBN 250568)  
*rwalsh@goodwinlaw.com*

Hayes P. Hyde (SBN 308031)  
*hhyde@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
Three Embarcadero Center  
San Francisco, California 94111  
Tel.: +1 415 733 6000  
Fax.: +1 415 677 9041

Hong-An Vu (SBN 266268)  
*hvu@goodwinlaw.com*

**GOODWIN PROCTER LLP**  
601 S. Figueroa Street, 41st Floor  
Los Angeles, California 90017  
Tel.: +1 213 426 2500  
Fax.: +1 213 623 1673

*Attorneys for Defendant: Otto Trucking LLC*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

Waymo LLC,

Plaintiff,

v.

Uber Technologies, Inc.; Ottomotto LLC; Otto  
Trucking LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**NOTICE OF INSPECTION**

PLEASE TAKE NOTICE THAT, pursuant to Rule 34 of the Federal Rules of Civil Procedure and the expedited rules and proceedings in this case, counsel for defendant Otto Trucking LLC and one or more of Otto Trucking's experts (and Special Master John Cooper if he so wishes) will inspect Waymo's network, including how laptops interact with Waymo's network, including the SVN server, and the metadata generated from those interactions. As part of the inspection, Otto Trucking will need access to the following:

1. A Google-issued laptop (ThinkPad T430S US) that
  - a. Has a standard Google Windows image, the same as what would have been used in that organization on December 11, 2015;
  - b. Runs versions of their endpoint software including [REDACTED] and [REDACTED] in use during the time period in question;
  - c. Contains a user profile to be configured as Local Administrator on that laptop;
  - d. Has a group or user policy that matches that of Anthony Levandowski just prior to his departure. (That means access to all the same resources that Levandowski had);
2. Administrative access on the [REDACTED] client that allows user to customize rules;
3. Access to Tortoise SVN software on removeable media such that Otto Trucking's can install TortoiseSVN while connected to the Waymo network;
4. Access to the entire SVN network to the same extent that was Anthony Levandowski was provided on December 11, 2015;
5. Provide the same version of [REDACTED] software on a USB removable media device in order to allow imaging of the laptop in the same manner as was done by the Google Security team;
6. Access to [REDACTED] log files associated to that laptop computer and created during the time period this work is being performed;
7. Access to any software and laptop OS versions to replicate the above operations as of December 22, 2015, or documentation that contains information about any

1 modifications to the versions, settings or systems between the time of the original  
2 capture and our test so that we can account for variances; and

- 3 8. Waymo's logging software or systems capable of monitoring downloading activity  
4 by Google or Waymo employees not discussed in Mr. Brown's declaration be  
5 disclosed and made available for testing.

6 Local copies of any files to which Waymo provides access as part of this inspection will be  
7 deleted at the end of the inspection. However, Otto Trucking would maintain a copy of any logs  
8 and metadata created as part of this inspection.

9 The inspection shall take place on August 17, 2017 beginning at 9 a.m.

10 Dated: August 7, 2017

Respectfully submitted,

11 By: /s/Neel Chatterjee  
12 Neel Chatterjee  
13 *nchatterjee@goodwinlaw.com*  
14 Brett Schuman  
15 *bschuman@goodwinlaw.com*  
16 Shane Brun  
17 *sbrun@goodwinlaw.com*  
18 Rachel M. Walsh  
19 *rwalsh@goodwinlaw.com*  
Hong-An Vu  
*hvu@goodwinlaw.com*  
Hayes P. Hyde  
*hhyde@goodwinlaw.com*  
James Lin  
*jlin@goodwinlaw.com*  
**GOODWIN PROCTER LLP**

20 *Attorneys for Defendant:*  
21 *Otto Trucking LLC*  
22  
23  
24  
25  
26  
27  
28

**PROOF OF SERVICE.**

I am an attorney at the law firm of Goodwin Procter, LLP, whose address is 601 South Figueroa Street, 41<sup>st</sup> Floor, Los Angeles, CA 90017. I am over the age of 18 and not a party to the within action.

On **August 7, 2017**, I caused the following documents to be served on all counsel of record via electronic mail, pursuant to the agreement between the parties:

**OTTO TRUCKING LLC'S NOTICE OF INSPECTION**

Charles K. Verhoeven  
David A. Perlson  
Melissa Baily  
John Neukom  
Jordan Jaffe

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
50 California Street, 22nd Floor  
San Francisco, CA 94111-4788

Counsel for Plaintiff: *Waymo LLC*  
Telephone: 415.875.6600  
Facsimile: 415.875.6700  
QE-Waymo@quinnemanuel.com

David Cooper  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
51 Madison Avenue, 22nd Floor,  
New York, New York 10010

Counsel for Plaintiff: *Waymo LLC*  
Telephone: 212.849.7000  
Facsimile: 212.849.7100  
QE-Waymo@quinnemanuel.com

Leo P. Cunningham  
WILSON SONSINI GOODRICH &  
ROSATI  
650 Page Mill Road  
Palo Alto, CA 94304-1050

Counsel for Plaintiff: *Waymo LLC*  
Telephone: 650.493.9300  
Facsimile: 650.493.6811  
lcunningham@wsgr.com

Arturo J. Gonzalez  
Daniel Pierre Muino  
Eric Akira Tate  
Esther Kim Chang  
Matthew Ian Kreeger  
Michael A. Jacobs  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, CA 94105

Counsel for Defendants: *Uber Technologies Inc.*  
and *Ottomotto LLC*  
Telephone: 415.268.7000  
Facsimile: 415.268.7522  
UberWaymo@mofo.com

Michelle Ching Youn Yang  
MORRISON FOERSTER LLP  
2000 Pennsylvania Avenue, NW  
Washington, DC 20006

Counsel for Defendants: *Uber Technologies Inc.*  
and *Ottomotto LLC*  
Telephone: 202.887.1500  
Facsimile: 202.887.0763  
UberWaymo@mofo.com

Rudolph Kim  
MORRISON & FOERSTER LLP  
755 Page Mill Road  
Palo Alto, CA 94304

Counsel for Defendants: *Uber Technologies Inc.*  
and *Ottomotto LLC*  
Telephone: 650.813.5600  
Facsimile: 650.494.0792  
UberWaymo@mofo.com

Wendy Joy Ray  
MORRISON & FOERSTER LLP  
707 Wilshire Blvd., Suite 6000  
Los Angeles, CA 90017

Counsel for Defendants: *Uber Technologies Inc.*  
and *Ottomotto LLC*  
Telephone: 213.892.5200  
Facsimile: 213.892.5454  
UberWaymo@mofo.com

Michael Darron Jay  
BOIES SCHILLER & FLEXNER LLP  
401 Wilshire Boulevard, Suite 850  
Santa Monica, CA 90401

Counsel for Defendants: *Uber Technologies Inc.*  
and *Ottomotto LLC*  
Telephone: 310.752.2400  
Facsimile: 310.752.2490  
BSF\_EXTERNAL\_UberWaymoLit@bsfllp.com

Meredith Richardson Dearborn  
BOIES SCHILLER FLEXNER LLP  
435 Tasso Street, Suite 205  
Palo Alto, CA 94301

Counsel for Defendants: *Uber Technologies Inc.*  
and *Ottomotto LLC*  
Telephone: 650.445.6400  
Facsimile: 650.329.8507  
BSF\_EXTERNAL\_UberWaymoLit@bsfllp.com

Hamish Hume  
Jessica E Phillips  
Karen Leah Dunn  
Kyle N. Smith  
Martha Lea Goodman  
BOIES SCHILLER FLEXNER LLP  
1401 New York Ave., NW  
Washington, DC 20005

Counsel for Defendants: *Uber Technologies Inc.*  
and *Ottomotto LLC*  
Telephone: 202.237.2727  
Facsimile: 202.237.6131  
BSF\_EXTERNAL\_UberWaymoLit@bsfllp.com

John L. Cooper  
FARELLA BRAUN + MARTEL LLP  
235 Montgomery Street, 17th Floor  
San Francisco, CA 94104

Appointed by Court as: *Special Master*  
Telephone: 415.954.4410  
Facsimile: 415.954.4480  
jcooper@fbm.com  
MCate@fbm.com

☒ (E-MAIL or ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on **August 7, 2017**, at Los Angeles, California.

Hong-An Vu  
(Type or print name)

/s/Hong-An Vu  
(Signature)